

**Federal Defenders  
OF NEW YORK, INC.**

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Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

**BY ECF**

Honorable Victor Marrero  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Sep

**Request GRANTED.**

The condition of curfew enforced by  
location monitoring is hereby removed.

**SO ORDERED.**

9/7/2022

DATE

  
VICTOR MARRERO, U.S.D.J.

**Re: United States v. Leonaldo Bueno Coplin  
22 Cr. 144 (VM)**

Dear Judge Marrero:

I write, without objection from Pretrial Services or the Government, to request that the Court modify Mr. Bueno-Coplin's bail conditions as follows:

1. Remove the condition of a curfew enforced by location monitoring.

On December 8, 2021, Mr. Bueno-Coplin was released on bond with the following conditions: a \$75,000 unsecured personal recognizance bond signed by 3 financially responsible persons; Pretrial Services supervision as directed: home detention with GPS monitoring; travel limited to SDNY/ENY and ED PA (and points in between for purposes of travel; surrender all travel documents; and continue or seek employment.

On May 27, 2022, the Court modified Mr. Bueno-Coplin's bail by replacing the condition of home detention with a curfew enforced by location monitoring and by permitting travel to the District of New Jersey for purposes of work.

Since his initial release nine months ago, Mr. Bueno-Coplin has fastidiously abided by his conditions of release. He remains employed full time as a house painter, and he has demonstrated that a curfew condition is not necessary to ensure his presence in court or to ensure the safety of the community.

Therefore, I respectfully request that the Court modify his bail conditions as requested.

Respectfully submitted,

*/s/ Amy Gallicchio*

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